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ENVIRONMENTAL PROTECTION AGENCY

PUBLIC HEARING

Statement of

SCOTT PATTISON
EXECUTIVE DIRECTOR
CONSUMER ALERT



*regarding a waiver application for the gasoline additive MMT
(methylcyclopentadienyl manganese tricarbonyl)*

September 12, 1991

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STATEMENT OF CONSUMER ALERT
ENVIRONMENTAL PROTECTION AGENCY PUBLIC HEARING
regarding the
WAIVER APPLICATION FOR MMT

I want to thank the members of the EPA advisory panel for affording Consumer Alert the opportunity to represent the views of the average American consumer concerning the Ethyl Corporation's application for a waiver for the introduction of a manganese-based fuel additive. There are numerous technical experts here today and I will confine my remarks to the consumer viewpoint on this issue.

I am Scott Pattison, Executive Director of Consumer Alert, Inc. Founded in 1977, Consumer Alert is a nationwide, non-profit, non-partisan organization with members in all fifty states. I am very pleased to be here representing the views of the thousands of Consumer Alert members. Consumer Alert educates consumers and policy makers about pro-competitive policies, advances safe technology through science and disseminates accurate risk data to the public.

Consumer Alert has a strict policy of never endorsing any consumer product. We are merely appearing here today to point out that consumers do benefit from new technology and that new, innovative technology -- beneficial to consumers -- should never be denied introduction into the marketplace unless there are valid scientific reasons that justify preventing its use. These scientifically-based reasons could include, for example, health and safety considerations or product ineffectiveness.

Consumer Alert has a long history of supporting and encouraging the development of innovative new technologies. New technologies lead to numerous benefits for consumers. Throughout history, advances in technology have served to improve the quality of life for all people. New technologies lead to improved products, a cleaner environment, increased efficiency and lower prices.

As a group representing consumers nationwide, we are particularly encouraged by any new technology that will assist communities in attaining Clean Air standards. The waiver application filed by the Ethyl Corporation involves a manganese-based performance additive. The company has submitted an enormous amount of data to the Environmental Protection Agency (EPA). This data, we are told, has been carefully gathered and scrutinized.

The company claims that the data demonstrates that the product can attain an overall reduction in regulated pollutants. This includes reductions in carbon monoxide emissions from vehicle tail pipes and a reduction of as much as 20% in nitrogen oxide (NOx). These results are truly impressive. We are also impressed with the potential smog reducing effect of the fuel additive.

The testing data submitted to EPA also holds the promise of decreasing the United States' dependence on foreign petroleum. By raising octane levels in crude gasoline, the product would reduce the amount of refining and this in turn could reduce dependence on imported oil. The submitted data indicates that the performance additive can produce an estimated savings of as much as 82,000 barrels of crude oil per day. The company also indicates that the data demonstrates that the additive can be used without harming the emission control devices of automobiles.

All of this is potentially very good news for consumers who seek a clean environment, decreased oil imports and also wish to keep the cost of gas and new autos low.

I think, however, the most important point to make about this application is the fact that this product is not an entirely new, not-yet-used technology, but an additive that has been available in Canada for several years. Consumers in Canada have enjoyed the use of this product and its benefits for years.

On environmental issues, as well as many other issues, there is often political posturing and rhetoric. Parties with various interests sometimes

seek to sidetrack the detailed and precise procedures laid out for an application such as the one being discussed here today.

The scientific data and the claims for the product are all subject to review and we are confident that you will give them a fair and impartial review. We merely ask, on behalf of all of the consumers of this nation, that the test data submitted by the company receive a rigorous but fair review on the merits and be in accord with the proper standards by which it is to be judged. Any final determination regarding this waiver application should be determined by the scientific data. Consumer Alert is confident that that will be the case with this particular waiver application and I appreciate the opportunity to present the views of the average consumer.

Thank you.